UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	Honorable Marianne O. Battani

:	Case No. 2:12-cv-00103-MOB-MKM
:	Case No. 2:12-cv-00203-MOB-MKM
:	Case No. 2:12-cv-00303-MOB-MKM
:	Case No. 2:12-cv-00403-MOB-MKM
:	Case No. 2:12-cv-00603-MOB-MKM
	:

SYSTEMS	
IN RE: ALTERNATORS	: Case No. 2:13-cv-00703-MOB-MKM
IN RE: RADIATORS	: Case No. 2:13-cv-01003-MOB-MKM
IN RE: STARTERS	: Case No. 2:13-cv-01103-MOB-MKM
IN RE: SWITCHES	: Case No. 2:13-cv-01303-MOB-MKM
IN RE: IGNITION COILS	: Case No. 2:13-cv-01403-MOB-MKM
IN RE: MOTOR GENERATORS	: Case No. 2:13-cv-01503-MOB-MKM
IN RE: STEERING ANGLE SENSORS	: Case No. 2:13-cv-01603-MOB-MKM
IN RE: HID BALLASTS	: Case No. 2:13-cv-01703-MOB-MKM
IN RE: INVERTERS	: Case No. 2:13-cv-01803-MOB-MKM
IN RE: AIR FLOW METERS	: Case No. 2:13-cv-02003-MOB-MKM
IN RE: FUEL INJECTION SYSTEMS	: Case No. 2:13-cv-02203-MOB-MKM
IN RE: AUTOMATIC TRANSMISSION	: Case No. 2:13-cv-02403-MOB-MKM

FLUID WARMERS

IN RE: VALVE TIMING CONTROL DEVICES: Case No. 2:13-cv-02503-MOB-MKM IN RE: ELECTRONIC THROTTLE BODIES : Case No. 2:13-cv-02603-MOB-MKM

THIS DOCUMENT RELATES TO : ALL END - PAYOR ACTIONS :

DECLARATION OF CLASS MEMBER/OBJECTOR OLEN YORK

I, Olen York, declare as follows:

- 1. I meet the minimum requirement for class membership because I purchased a qualifying new vehicle in the State of West Virginia during the class period.
- 2. According to the class notice, class members must be able to identify which of the covered automobile parts are installed in their vehicle to qualify for a monetary award. However, End-Payor Defendants and Plaintiffs have not published any source to help potential claimants to meet their burden.
- 3. In March 2016, I asked my local Ford dealer to determine whether any of the parts identified in the class action notice could be found in the 2009 Ford Escape owned by my spouse (Amy) and/or on the 2010 Ford Focus owned by my mother (Nancy) based upon their VIN numbers.
- 4. After several days of searching and comparing internal information, the dealer provided print-outs for each vehicle (attached as Exhibits A-3 and A-4 to the York joint objections). (Doc. No. 1339-2).
- 5. According to the dealer, the only reliable means of determining how many of our automotive parts are covered by the various settlements is to tear out each part from the vehicle and to conduct an inventory of each part, followed by a professional inspection at the dealer's hourly charge for such service.
- 6. After exercising due diligence to find other possible means (including my own efforts and those of my attorney), I have concluded there is no efficient or reasonable

method for verifying which of the covered parts were installed in my vehicle with absolute certainty. Neither do I believe the parties possess any such source.

7. Based on my research thus far, I can only state with relative confidence that my vehicle (a 2003 Toyota Corolla no longer in my possession), and/or the 2009 Ford Escape and/or the 2010 Ford Focus covered by the York joint objection are, at minimum, equipped with a qualifying Autoliv Occupant Safety Restraint System. I will continue my investigation until the claims period expires.

8. Under the foregoing circumstances, I believe less than 1% of eligible class members will submit claims that will meet the claims administrator's approval.

I declare under penalty of perjury that the foregoing statements of fact are true and accurate to the best of my knowledge and belief.

Executed this 9th day of May, 2016 in Milton, West Virginia for ECF filing by counsel.

/s Olen York
Olen York
15 Riverview Court
Milton, W.Va. 25541
304.633.1178
Class Member/Objector

CERTIFICATE OF SERVICE

I certify that on May 9, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court via CM/ECF by ECF filing through my attorney. Notice of this filing will be sent by email to all counsel of record by operation of the Court's electronic filing system.

<u>/s Olen York</u> Olen York